

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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In the Matter of )

Revision of the Commission's  
Rules to Ensure Compatibility  
with Enhanced 911 Emergency  
Calling Systems )

) CC Docket No. 94-102  
)  
)  
)

To: The Commission

**RECEIVED**  
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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**COMMENTS OF APCO  
REGARDING *EX PARTE* PRESENTATIONS  
ON CERTAIN TECHNICAL ISSUES**

The Association of Public-Safety Communications Officials-International, Inc. ("APCO"), hereby submits the following comments in response to the Commission's Public Notice, DA 97-1502, (July 16, 1997), seeking additional comments in the above-captioned proceeding regarding recent *ex parte* presentations by the Wireless E911 Coalition, GTE Wireless, and the Ad Hoc Alliance for Public Access to 911.

APCO, founded in 1935, is the nation's oldest and largest public safety communications organization. APCO's over 12,000 members are involved in the management and operation of police, fire, emergency medical and other public safety communications facilities throughout the nation, including Public Safety Answer Points ("PSAPs") charged with answering and responding to 9-1-1 calls. The Commission's Report and Order in this proceeding was based upon a consensus plan submitted by APCO, the National Emergency Number Association, the National Association of State of Nine One One Administrators, and the Cellular Telephone Industry Association.

APCO continues to support the Commission's decisions in the Report and Order, including the rules that permit individual PSAPs to determine if they wish to receive 9-1-1 calls from non-initialized wireless telephones. Now, at the eleventh hour, the Wireless E911 Coalition ("Coalition") has

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submitted information to suggest that the Commission rules are not feasible for certain types of wireless technologies. Rather than address the technical issues raised by the Coalition in great detail, these comments will suggest the proper context in which the Coalition's claim's need to be considered.

First, there must be a presumption that the Commission's rules are reasonable and technically feasible. There has already been multiple comment periods and ample opportunity for the Coalition and other parties to raise issues with the Commission's approach in this proceeding. Therefore, especially, at this late date, the Coalition has a very heavy burden to overcome before the Commission should reconsider any of its prior actions.

Second, the Coalition never approached the public safety community to discuss the issues raised in their *ex parte* filings. Until now, there has been an excellent record of cooperation and communication between the wireless industry and public safety groups when addressing the complex issues raised in this proceeding. The matters discussed by the Coalition will have a direct and significant impact on public safety agencies, and we should have been consulted in advance, rather than being forced to respond in less than twelve days and on the apparent eve of final Commission action on pending petitions for reconsideration.

Third, PSAP options are important. The technical characteristics, size, autonomy, and degree of centralization of PSAPs vary greatly from state to state, and often from city to city. APCO recognizes that these variances pose added hurdles for the wireless industry, and we are prepared to help to overcome those hurdles to the extent possible. In particular, we acknowledge that it will be difficult to treat two or more PSAPs differently if they are served by a single 9-1-1 tandem. We also note that differences between PSAPs are likely to diminish as they adapt to the Commission's rules and new technologies. However, in general, the fact that differences between PSAPs exist should not be used to undermine the ability of PSAPs to receive wireless 9-1-1 calls and to be able to identify the location and number of the call.

Fourth, nobody said this would be easy. The Coalition complains about the cost and time

involved in modifying switching software and other related modifications. However, PSAPs, LECs, and wireless carriers are all assuming important responsibilities and considerable expense to make wireless E9-1-1 a reality, benefiting the public at large and the wireless carriers themselves who have marketed the safety aspects of their product. All of the participating parties are paying a price to ensure that the dramatically expanding percentage of the population that depends upon wireless telephones will be able to call 9-1-1 and be found quickly by emergency response personnel. It would appear that the Coalition has, at most, identified another hurdle to overcome, but nothing that is insurmountable.

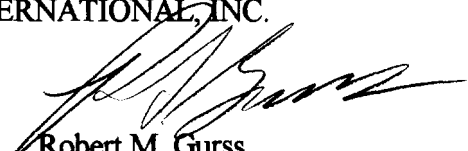
### CONCLUSION

Therefore, APCO urges the Commission to move forward and to consider the comments set forth above in reviewing the merits of the Coalition's claims.

Respectfully submitted,

ASSOCIATION OF PUBLIC-SAFETY  
COMMUNICATIONS OFFICIALS-  
INTERNATIONAL, INC.

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July 28, 1997

CERTIFICATE OF SERVICE

I, Jane Nauman, hereby certify that copies of the foregoing Comments of APCO Regarding *Ex Parte* Presentations on Certain Technical Issues were sent on this 28<sup>th</sup> day of July, 1997, via U.S. Mail, postage prepaid, to the following individuals at the addresses listed below:

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